

Central Office Scan Procedures – November 2004
Document Header Sheet – Tempo

Patch III – Next Page Starts New Batch

AI Number: 2805

Program Code: 001

Received Date: 9/29/05

Document Description: ARNAPR

Functional Area Code: 218

KYEIS ID# 21-

Alternative/Historic A.I. Identifier: BGAD

Comments:

OVERSIZED DOCUMENT:
FRONT/BACK PRINT:
COLOR PAGES:

Scanner Operators only

Batch Number: 4116

Prepared: **Operator:**

Scanned: **Operator:**

Quality Check: **Operator:**

Indexed: **Operator:**

Rescanned: **Operator:**

DePrep: **Operator:**

**COMMONWEALTH OF KENTUCKY
DEPARTMENT OF ENVIRONMENTAL
PROTECTION**

RECEIVED

2005 SEP 28 P 12:33

DIVISION OF WASTE MGMT.
CLEANUP WASTE BRANCH

DIVISION OF AIR QUALITY

PUBLIC MEETING

Held at:

Eastern Kentucky University

Carl D. Perkins Building

Richmond, Kentucky

August 30, 2005

6:10 P.M.

RECEIVED

SEP 28 2005

PERMIT REVIEW BRANCH
DIVISION FOR AIR QUALITY

ASSOCIATED REPORTING SERVICES, INC.

FREELANCE COURT REPORTERS & VIDEO SERVICES
STEPHANIE K. SCHLOEMER, PRESIDENT

114 NORTH UPPER STREET

P. O. BOX 85, LEXINGTON, KENTUCKY 40588-0085

(859) 233-9272 (800) 882-3197

arsi@alltel.net

www.arsionline.com

ORIGINAL

APPEARANCES

(on behalf of the Division of Air Quality)

JAMES MORSE, Administrative Support Section
BRYAN BALLARD, Environmental Engineer Assistant

PUBLIC SPEAKERS

(in order of appearance)

CRAIG WILLIAMS, on behalf of the Kentucky Environmental Foundation
and the Chemical Weapons Working Group

1
2 MR. MORSE: Good evening. My
3 name is Jim Morse. I am supervisor of the Permit
4 Support Section for the Division of Air Quality. I
5 will serve as your moderator tonight.

6 This public hearing is now in session.
7 Written comments on the air quality aspects of this
8 permit will be accepted at the end of this hearing. If
9 you have comments for the waste aspects, or the waste
10 permit, that is, we will be having a separate hearing
11 after this tonight.

12 If you have not signed a card at the
13 registration table and you wish to comment, please do
14 so.

15 Our division is responsible for
16 regulating air pollution in this state. We operate a
17 central office in Frankfort and eight regional offices,
18 including one in Frankfort, which serves the Madison
19 County area.

20 The purpose of tonight's public hearing
21 to is to receive your comments on a proposal by Blue
22 Grass Army Depot to build a facility to neutralize
23 chemical weapons at their existing Madison County
24 facility.

25 The Division for Air Quality has
conducted an initial review of the application for this

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 project.

2 We have drafted a permit which proposes
3 to approve the project, since it meets all known air
4 quality requirements.

5 Copies of the draft permit and
6 supporting information were made available at the local
7 library and advertised in the newspapers on July 29th,
8 2005.

9 Our court reporter is Barbara Sims with
10 Associated Reporting Services. You can obtain a copy
11 of the transcript of this public hearing by making
12 arrangements directly with Ms. Sims. She will advise
13 you of the expected timeframe for completion of the
14 transcript and the cost of a copy.

15 In a few minutes I will describe the
16 procedures we will be following tonight and take your
17 comments. But first, I would like to introduce Mr.
18 Bryan Ballard, our staff engineer, who reviewed
19 application and drafted the permit. He will give you
20 some details of the review our division has conducted
21 of the proposed project.

22 MR. BALLARD: Hello. As Jim
23 said, I'm Bryan Ballard, the Air Quality permit writer
24 for the Blue Grass Chemical Agent Destruction Pilot
25 Plant.

ASSOCIATED REPORTING SERVICES, INC.
(859) 233-9272 (800) 882-3197 arsi@alltel.net
schedule online @ www.arsionline.com

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 Today I will be presenting a brief
2 overview of the draft Clean Air Act Title 5 permit,
3 permit number V05034.

4 The permit authorizes the construction
5 and operation of the Blue Grass Chemical Agent
6 Destruction Pilot Plant. The BGCAPP is required to
7 obtain a Title 5 operating permit by the Clean Air Act.
8 The Clean Air Act was passed by the US Congress in 1970
9 with major amendments in 1977 and 1990.

10 The Clean Air Act regulates air
11 emissions from area, stationary and mobile sources. It
12 authorizes the US Environmental Protection Agency to
13 establish national ambient air quality standards.
14 Permits are administered by the Commonwealth of
15 Kentucky.

16 The source description is the existing
17 emission sources associated with the Blue Grass Army
18 Depot permit by permit number V05020 issued on July
19 6th, 2005. And the emission sources associated with
20 proposed Blue Grass Chemical Agent Destruction Pilot
21 Plant permitted by permit number V05034, which is
22 currently out for public comment.

23 The BGCAPP will be located wholly within
24 the Blue Grass Army Depot's boundary. The aggregate
25 emissions of BGAD and BGCAPP constitute one major

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 source as defined in 401 KER 52001, section 1, part 45.

2 Regulatory applicability determinations
3 must be done considering the aggregate emissions of
4 BGAD and BGCAPP.

5 Permit number V05034 is based on the air
6 quality permit application received by the Division for
7 Air Quality on September 20th, 2004. The emission
8 units include the munitions demilitarization building,
9 process heat boilers, space heat boilers, diesel
10 powered emergency generators, and insignificant
11 activities. Insignificant activities are emission
12 units with low potential to emit and are defined in 401
13 KER 52020, section 6.

14 This presentation will focus on permit
15 requirements for the munitions demilitarization
16 building.

17 An applicable regulation to the MDB is
18 401 KER 63020, section 3, which requires that no owner
19 or operator shall allow any affected facility to emit
20 potentially hazardous matter or toxic substances in
21 such quantities or duration as to be harmful to the
22 health and welfare of humans, animals and plants.

23 In the BGCAPP air quality permit,
24 potentially hazardous matter or toxic substances
25 include, but is not limited to, the chemical agents

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 Blister Agent H-HT, Lethal Nerve Agent GB, Lethal Nerve
2 Agent BX, and substances that the EPA Office of Air
3 Quality Planning and Standards has recommended a
4 health-based standard.

5 MDB operating limitation B requires that
6 the general population limits specified by the Center
7 for Disease Control and Prevention for Blister Agent H-
8 HT, Lethal Nerve Agent BX, and Lethal Nerve Agent GB
9 shall not be exceeded at the Blue Grass Army Depot
10 boundary.

11 MDB operating limitation C requires that
12 the concentration of toxic emissions at the BGAD
13 property boundary, as determined by air dispersion
14 methods, shall not exceed the most up to date base
15 standards recommended by the EPA Office of Air Quality
16 Planning and Standards.

17 401 KER 63010, section 3, requires that
18 evaluation of such facilities as to accuracy of
19 controls and/or procedures and emission potential will
20 be made on an individual basis.

21 Based on the September 2004 application,
22 toxic emissions from the facility will be very minimal
23 because of the efficiency of the process itself and
24 high efficiency primary and secondary air pollution
25 control equipment.

1 Compliance with 401 KER 63020 would
2 hinge on the development of a comprehensive operating
3 and maintenance plan to ensure the control were
4 performed so as to deliver the optimal efficiency.

5 Some important considerations are that
6 there is an ongoing redesign effort. The redesigned
7 facility will be smaller than the proposed facility in
8 the September 2004 application. The quantity of
9 emissions from the redesigned facility will be less
10 than the proposed facility in the September 2004
11 application.

12 The BGCAPP design is not complete. Blue
13 Grass anticipates the MDB to be at 60 percent design by
14 May 2006.

15 Construction cannot begin until the air
16 quality permit is issued. Operation cannot begin until
17 the submittal and approval by the Division for Air
18 Quality of an operating plan and air dispersion model
19 protocol.

20 Compliance with the operating
21 limitations B and C will be achieved by the submittal
22 of an operating plan no later than 18 months prior to
23 the beginning of demilitarization operations, followed
24 by the submittal of an air dispersion model protocol no
25 later than 12 months prior to the beginning of

1 demilitarization operations.

2 The operating plan and air dispersion
3 model protocol will be reviewed by the Division for Air
4 Quality.

5 The operating plan must provide details
6 of the methods by which emission rates of very toxic
7 agents from the MDB filters will be established. The
8 operating plan must also specify the testing,
9 monitoring and recordkeeping requirements that will be
10 followed to assure compliance with all the
11 requirements.

12 The permit will be reopened and the
13 operating plan will be incorporated to the permit
14 through a significant permit revision as specified in
15 401 KER 52020, section 16, affording the opportunity
16 for public comment.

17 In closing, the BGCAPP air quality
18 permit contains requirements that reflect the Division
19 for Air Quality mission statement, "To protect human
20 health and the environment by achieving and maintaining
21 acceptable air quality."

22 I would now like to turn the hearing
23 back over to Jim Morse. Thank you.

24 MR. MORSE: Now I will
25 describe the way we'll conduct the rest of the hearing.

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 I hope that each of you will recognize
2 that there may be differing opinions in the room about
3 this proposed project. Please let me remind you that
4 every person here is entitled to voice his or her
5 opinion.

6 Persons providing comments tonight will
7 not be questioned by you or me regarding their comments
8 except that I may ask a clarifying question if I feel
9 that a comment is unclear.

10 Our division will not determine its
11 position tonight regarding any comments made. It's
12 important that our staff thoroughly review all
13 additional information that we receive during the
14 public comment period, pro and con, prior to finalizing
15 a position on each issue.

16 Our agency has authority to address only
17 the air quality aspects of this project. We would
18 appreciate it if you would limit your comments during
19 this hearing to the air quality aspects of this
20 project.

21 We would be happy to assist you in
22 determining the appropriate agency or office towards
23 which to direct other comments or concerns.

24 It is not necessary for anyone to read
25 his or her written comments tonight, either in part or

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 in their entirety.

2 Verbal and written comments will receive
3 equal review and consideration. If anyone has a long
4 statement, I urge that it be summarized in tonight's
5 presentation and a full written copy be provided to our
6 office at the close of this hearing.

7 Now, I understand that no one has signed
8 up to make any comments about the air quality aspects
9 of this hearing.

10 Is there anyone who hasn't signed up
11 that does wish to say something tonight for the record?

12 Sir, are you here to make a comment on
13 air quality tonight?

14 MR. WILLIAMS: I will be
15 submitting those comments tomorrow.

16 MR. MORSE: We will be
17 accepting comments until the close of this hearing,
18 sir. This is the end of the comment period. If you'd
19 like to submit them tonight or if you'd like to say
20 something for the record, this is your chance to do so.

21 MR. WILLIAMS: I was under the
22 impression that all three hearings were the same
23 deadline, close of business August 31st.

24 MR. MORSE: That is not
25 correct. We are Air Quality. This is the hearing

1 we're holding tonight and the other hearing will be
2 immediately after this, following a short intermission.
3 I don't know what arrangements they've made for
4 accepting comments.

5 MR. WILLIAMS: I was under the
6 impression that all three permits comments were due on
7 the same day, August 31st.

8 MR. MORSE: How did you get
9 that impression? I don't think it stated that in the
10 ad.

11 If you'd like to come up to this
12 microphone here in the center aisle, we're ready when
13 you are.

14 Could you please state your name and
15 face our reporter here for the record.

16 MR. WILLIAMS: My name is
17 Craig Williams and at the moment I'll be speaking on
18 behalf of the Kentucky Environmental Foundation and the
19 Chemical Weapons Working Group.

20 My comments on this, although totally
21 unprepared, would be as follows:

22 First of all, we have reviewed portions
23 of the air quality permit, and we were prepared to
24 submit written comments tomorrow, which was the
25 impression that we had was the deadline, so I'd just

1 like to put that in the record. And we may submit them
2 tomorrow regardless and petition for their acceptance
3 to this communication.

4 The only issue that I would like to
5 raise specifically are concerns that we have
6 surrounding various design changes which will, I
7 assume, include modifications to the air permit as it
8 will to the RD&D and storage permit as the design
9 changes are finalized.

10 And in the context of those design
11 changes and any modifications that might be included in
12 the air permit because of those design changes, we'd
13 like to go on the record and note that we would seek
14 the opportunity to review and comment on those
15 modifications, particularly the areas associated with
16 the off gas treatment system that was contained in the
17 original design as is now under review in the design
18 considerations that are ongoing.

19 And particularly and specifically with
20 the substitution of the catalytic oxidizer component of
21 the off gas treatment system in comparison to what I
22 believe they call the batch oxidizer that is considered
23 to be substituted for that catalytic oxidizer.

24 Again, I would just like to restate that
25 any of these ongoing design changes and their

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1 modifications and the way they might impact the air
2 quality permit we would like to go on the record and
3 say we'd like to see those modifications, have an
4 opportunity to digest them and comment on them as the
5 process moves forward.

6 Thank you.

7 MR. MORSE: There's no one
8 else who wishes to speak?

9 (NO RESPONSE FROM AUDIENCE)

10 MR. MORSE: When the proposed
11 permit is written, the division will make available a
12 list of the comments received and our responses to
13 them.

14 A copy of the proposed permit and
15 supporting information will be sent to the Region 4
16 office of the US Environmental Protection Agency in
17 Atlanta, Georgia.

18 During the EPA's 45 day comment period,
19 anyone who has made comment on this draft permit will
20 have the opportunity to petition the EPA to make
21 changes in the permit at that time.

22 Thank you all for coming tonight. The
23 Air Quality public hearing is closed.

24 There will be a brief intermission of
25 perhaps five minutes after which the Division of Waste

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

1

will conduct their hearing.

(HEARING CONCLUDED AT 6:28 P.M.)

KY Department of Environmental Protection - August 30, 2005
Public Hearing - Division of Air Quality

COMMONWEALTH OF KENTUCKY)


)

COUNTY OF FAYETTE)

I, BARBARA SIMS, Court Reporter and
Notary Public in and for the Commonwealth of Kentucky
at Large, whose commission as such will not expire
until April 29, 2009, do hereby certify that the
foregoing proceeding was taken before me at the time,
place and for the purposes set forth in the caption and
that the foregoing transcript is a true, complete and
accurate transcript of said proceeding.

I further certify that I am not related
to nor employed by any of the parties to this action
and I have no personal interest in the outcome of the
same.

WITNESS my hand on this the 23rd day of
September 2005.


BARBARA SIMS